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*Standby Counsel for Louis Delynn Hansen*

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

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UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
LOUIS DELYNN HANSEN,  
Defendant.

**PROPOSED VOIR DIRE QUESTIONS**

Case Number: 2:16-cr-00534-CW-1  
Judge: Clark Waddoups

Louis Delynn Hansen through his standby counsel respectfully request the Court ask the following questions in addition to the Court's stock voir dire questions.

**Questions Answered by Each Juror Individually and Aloud:**

1. Do you know anyone family, friend or acquaintance that has had problems with the IRS?  
What was the outcome?
2. Do you work outside the home, and if so, what is your occupation.
3. Have you ever done anything in your life that would bring your trustworthiness into question?
4. Do you believe that an individual is innocent until proven guilty, or do you believe that an individual that has been charged is guilty until proven innocent?

5. If I asked someone to tell me about you, what would they say?
6. What causes do you believe in, and why?
7. Can you think of anything in your own life that reminds you of this case? What, and how?
8. Is there anything that you have seen or heard about this case that would make it hard for you to be impartial?
9. Is there anything that we haven't asked you, that you think we should know?
10. Is there anything that you wish to discuss in private?
11. Do you fully understand Title 26 (USC) and the IRC?
12. Are you afraid of the IRS?
13. Do you consider yourself a good listener?
14. When was the last time you were judged for something that you did not do?
15. Have you ever had to convince someone of something that you didn't do? And what was the outcome? How did that make you feel?
16. If you were the one on trial, would you want someone like you on the jury?
17. What was the date that you took the oath to become a naturalized U.S. Citizen? And do you have proof of that event?

DATED this 17<sup>th</sup> day of May, 2017.

*/s/ Stephen R. McCaughey*

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STEPHEN R. McCAGHEY  
*Attorney for Defendant*

CERTIFICATE OF SERVICE

I hereby certify that on this 28<sup>th</sup> day of April, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following:

United States Attorney's Office

Via ECF

*/s/ Ysabel M. Lonazco*

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